III.   REMARKS

Claims 1-22 are pending in this application. Claims 1-5, 8-10 and 13-22 are rejected under 35 USC 102(b) as allegedly being anticipated by Matsuda et al., US 2002/0133573 ("Matsuda"), with Poger et al., US 6,772,420 B1 ("Poger"), providing intrinsic evidence for a device type being embedded in a MAC address. Claims 6-7 and 11-12 are rejected under 35 USC 103(a) as being allegedly unpatentable over Matsuda as applied to claims 4 and 10, in view of Okano et al. US 2002/0062485 ("Okano"). Claims 1, 8, 10, 14 and 19 have been amended. Claims 2-7 and 11-12 have been canceled. Applicant respectfully traverses the 35 USC 102(b) and 35 USC 103(a) rejections for the reasons provided below.

Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

A. REJECTION OF CLAIMS 1-5, 8-10 and 13-22 UNDER 35 U.S.C. §102(b)

With regard to the 35 U.S.C. §102(b) rejection over Matsuda with Poger providing intrinsic evidence, Applicant asserts that Matsuda and Poger do not teach each and every feature of the claimed invention.

Applicant has amended claim 1 (and similarly claims 10, 14 and 19) to include, with respect to the generating of a unique device identifier, the following: "wherein the generating of a unique device identifier is automatically performed by the server or a

unique device identifier is manually selected." Support for this amendment may be found in the specification at paragraph [0025].

Applicant submits that Matsuda and Poger fail to teach each and every feature of claim 1 (and similarly claims 10, 14 and 19), as amended. Matsuda and Poger do not teach the automatic generation of a unique device identifier or the manual selection of a unique device identifier.

Matsuda discloses an iterative process. In Matsuda, (1) client NOA suggests an IP address and name to server NOA; (2) server NOA acquires MAC address and retrieves previous name if it exists; (3) if previous name does not exist, a name is assigned; (4) server NOA then checks "not in use" field of DHCP table to see if selected name is in use; (5) if it is - the process reiterates; (6) server NOA determines if IP address is in use and continues modifying, checking and re-modifying as described in the previous paragraphs. [0065] ln.5-38. A review of this iterative process does not reveal an alternative between automatic or manual selection of a unique device identifier. Thus, Matsuda does not teach this feature of claim 1 as amended.

Accordingly, Applicant submits that claim 1 (and similarly claims 10, 14 and 19) is not anticipated by Matsuda and Poger.

B. REJECTION OF CLAIMS 6-7 AND 11-12 UNDER 35 U.S.C. §103(a)

With regard to the 35 U.S.C. §103(a) rejections of claims 6-7 and 11-12 over Okano in view of Matsuda, Applicant asserts that the combined references cited by the Office fail to teach or suggest each and every feature of the claimed invention.

In addition to the amendment described above, claim 1 (and similarly claims 10, 14, and 19) has been amended to include the subject matter of claims 2 through 7 to read: "associating correlation data with each of the set of device entries, wherein the correlation data includes a device type, user data, and device identifier status; obtaining one of the set of device entries based on correlation data for a particular device, wherein the device identifier status for the obtained one of the set of device entries indicates that the device identifier is unused; receiving a request from the particular device for an assigned device identifier, wherein the request includes correlation data for the particular device; communicating the device identifier for the one of the set of device entries to the particular device; setting the device identifier status to indicate that the device identifier for the device entry is pending after communicating the device identifier; receiving an acknowledgment from the particular device for the communicated device identifier; and setting the device identifier status to indicate that the device identifier for the device entry is in use after receiving the acknowledgment." Support for these amendments may be found in the specification at paragraphs [0030] and [0031].

The Office admits that Matsuda does not teach the subject matter of dependent claims 6 and 7. Office Action pp.9-10. The Office cites Okano at paragraphs [0092], [0099] and [0102] in support of its allegations. Specifically, none of the cited references teach or suggest "setting the status" of the device identifier for the device entry. The cited paragraphs reference Figure 2 of Okano. Figure 2 does not teach or suggest "setting the status" of the device identifier for the device entry.

Applicant submits that the combined references cited by the Office fail to teach or suggest each and every feature of claim 1 (and similarly claims 10, 14 and 19), as

amended. Accordingly, Applicant respectfully requests that the Office withdraw its rejection.

Applicants reiterate the foregoing arguments with respect to claim 1 for independent claims 10, 14 and 19 and respectfully request that the Office withdraw the rejection of independent claims 1, 10, 14 and 19 under 35 U.S.C. §102(a) and §103(a).

With respect to the dependent claims, Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicant submits that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicant respectfully requests withdrawal of this rejection.

IV. CONCLUSION

In addition to the above arguments, Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicant does not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

/David E. Rook/

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